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July 17, 2017

BY ECF & E-MAIL (bernstein.chambers@nysb.uscourts.gov)

Honorable Stuart M. Bernstein United States Bankruptcy Court, SDNY One Bowling Green New York, New York 10004

Re: Picard v. The Lustig Family 1990 Trust, Adv. Pro. No. 10-4417 ("Trust Case")

Picard v. David Ivan Lustig, Adv. Pro. No. 10-4554 ("IRA Case")

Dear Judge Bernstein:

We are counsel in the above-referenced cases for defendants David Lustig and The Lustig Family 1990 Trust. As the Court is aware, we have filed a motion for reconsideration of the Court's Order Granting Partial Summary Judgment Striking Affirmative Defenses entered in these cases on June 13, 2017. As discussed with Your Honor's law clerk, I respectfully write to request permission to file our reply papers in further support of the motion on or before <u>July</u> <u>26, 2017</u>, and to request that the Court not rule on the motion until after our reply papers are filed.

Thank you for Your Honor's time and consideration.

Respectfully submitted,

/s/ Bryan Ha Bryan Ha

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